

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA
Plaintiff

v.

EDWARD R. VELAZQUEZ
Defendant

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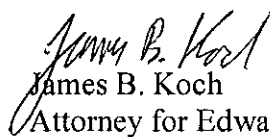
No. 08 CR 372
Title 18, United States Code,
Sections 1341, 1343, 2314, and 2.

MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

Defendant Edward R. Velazquez by his attorney James B. Koch, respectfully moves this Court to grant leave to file additional motions after the June 6, 2008 pretrial motions cutoff date. The office of the US Attorney has, pursuant to the rules of discovery, delivered or made available to defendant and his counsel some discovery materials. The undersigned counsel believes that additional 16.1 materials will be tendered by the government and there may be circumstances for which additional motions will be required.

WHEREFORE, defendant Edward R. Edward R. Velazquez respectfully requests that this Court enter an order granting defendant leave to file additional motions.

Respectfully Submitted,


James B. Koch
Attorney for Edward R. Velazquez

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